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Docket # E-01933A-15-0100

Dear ACC Commissioner:

Instead of penalizing individual citizens who are taking action to improve the United States energy position and reduce fossil fuel dependence, TEP and Arizona should continue to lead the nation by example in support of rooftop solar power.

In its proposal to the Arizona Corporation Commission (ACC Docket 15-0100), TEP would devalue energy produced by new solar rooftop customers. Even more onerous TEP has asked solar customers to sign waivers acknowledging blank check changes for the future solar energy rates. Rate changes are inevitable but must be borne equitably by our citizenry.

The Commission must take into account rooftop solar benefits to the public including less water use, less pollution, and less need for expanding centralized power plants which have environmental and regulatory costs absent in rooftop solar expansion.

Utility customers who install rooftop solar don't just save grid electricity. Solar customers add reliability to the grid by reducing vulnerability to unplanned outages at power plants. Plus, they add energy during the day, when demand is high and when it is more expensive for utilities to generate or buy electricity. But, unlike the utilities, rooftop facilities do not pass on either fixed or operating costs. They do piggyback onto the TEP existing grid and thereby firm up this solar power. TEP thus does have legitimate concerns over fixed costs; but at present solar adds such a small part as to be insignificant.

Arizona is unique in having tremendous solar energy resources compared to the rest of the country. ACC Commissioners must think of themselves as representatives of the energy needs of the United States as well as Arizona's.

At the very least the ACC should ask TEP address fixed cost questions in a new rate case. The Commission should direct TEP to find a better way to apportion fixed costs among both public and commercial ratepayers instead of penalizing a small, prescient vanguard of citizens who are financing the best new source of clean renewable energy.

It is indeed ironic that solar is becoming so cheap that utilities now consider it a threat to their economic well-being. THIS MAKES NO SENSE.

It does make sense for Arizona and Arizona's utilities to invest in low-carbon solar energy as a growing important part of our energy portfolio. There is time to stop this train wreck and act responsibly for all the citizens of Arizona and the nation.

Please reject the TEP proposal and direct them to perform a more thorough analysis in a public review process. The ACC needs to play the role of Solomon here. Do not allow TEP to cut the solar baby half to even to satisfy to equally valid concerns. Insist on a fair and open analysis; one subject to public review. Thank you for considering these suggestions.

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Arizona Corporation Commission  
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